

This matter has already been addressed in depth by the FCC in its Report and Order

99-412 in which it found that "because the amateur service is fundamentally a technical service, the emphasis on Morse Code proficiency as a licensing requirement does not comport with the basis and purpose of the service..." The Commission went on to note that "We have considered the comments on this issue and conclude that the public interest will best be served by reducing the telegraphy

examination requirement to the minimum requirement that we have found that meets the Radio Regulations..." As the commission is aware, the recent action by WRC-03 has left to the national administrations the right to "determine whether or

not a person seeking a license to operate an amateur station shall demonstrate the

ability to send and receive texts in Morse code signals." Many national administrations have already determined that such persons need not demonstrate specific levels of Morse code proficiency and have removed this requirement from their licensing standards.

Given the Commission's existing findings and regulations, no further argument is required. The Radio Regulations no longer require Morse code proficiency for amateur radio operators below 30 MHz. The subject petition should be granted and the relevant sections of Part 97 revised in accordance with the petition.

Respectfully submitted,

John Wiesenfeld
W5NYC